





RED ROCK AUDUBON SOCIETY

June 1, 2004

RE: Comments for the Scoping Process for Lake Mead National Recreation Area Air Tour Management Plans

Dear Sirs:

Thank you for this opportunity to provide scoping comments on the Lake Mead National Recreation Air Tour Management Plan.

There are several issues but two issues stand out: noise and safety. Aircraft, both fixed wing and helicopter are quite noisy and in large numbers have a significant impact on people on the ground. With company reported flight volume of over 82,000 flights annually this is over 225 flights per day every single day of the year. While not all these flights originate or end at the same place, a large percentage of them originate in or near Las Vegas and hence take similar routes over the Lake Mead National Recreation Area (LMNRA). This number of flights makes it seem to people on the ground like they are in the take-off path of a major airport. Hardly a great outdoor experience! Some areas are more reasonable for air travel routes than others. The lake itself, with its motorboat traffic is already more impacted by noise than the land portion of the LMNRA. Those areas which are either designated Wilderness or Wilderness Study Areas need to be avoided as much as possible. Solitude is indeed considered a major part of the wilderness experience.

The noise measurements which will be conducted need to be done at different seasons of the year to take into account atmospheric inversion effects and temperature differences. Noise in the colder temperatures of winter propagates much better than in summer. It is also important to determine the ambient background both with and without the commercial jetliner contribution.

The FAA and others have discussed "Quiet Technology" to permit aircraft to generate less noise than at present. We need to know whether this is a dream or reality. If it is not feasible then we need to let the public know that and move on. It is vital to take into account future growth of the air tour industry, when determining how the industry will be regulated in the future. After all, the whole issue of noise is largely a function of how many flights there are.

The very large number of air tour flights over the LMNRA, whether "solely for transportation purposes" to the Grand Canyon or acknowledged air tours of Lake Mead and vicinity itself makes it reasonable to designate the LMNRA a special use zone and closely regulate and monitor the flights of the air tour industry and others. Purely as a safety issue there should be established routes, corridors, and zones of separation. Safety is just as big an issue for the industry as it is for the flying public.

When flying over land minimum height above ground level rules need to be established so as to protect wildlife from harassment by helicopters. With GPS technology it is easy for helicopter pilots to let other pilots know the exact location of bighorn sheep and then multiple helicopters come in to show tour patrons wild sheep, something most of them have never seen before. While thrilling for tour patrons this is harassment of wildlife and should not happen.

Sincerely,

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